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FAA - 00-7479-22

July 26, 2000

U.S. Department of Transportation  
Dockets Room 401  
400 Seventh Street, SW  
Washington, D.C. 20590

**Re: Docket Number FAA-2000-7479; Notice Number 00-05**

The National Fire Protection Association (NFPA) is pleased to submit the following comments to the Federal Aviation Administration (FAA) on Docket No. FAA-2000-7479; published at 65 Federal Register page 38636.

The NFPA supports the expansion of ARFF requirements to smaller airports and many of the revisions being proposed to 14 CFR Part 139. However, FAA has not gone far enough with the revisions to ensure safe airports throughout the United States and we therefore urge FAA to adopt the NFPA/ANSI Consensus Standard 403 on "*Aircraft Rescue and Fire Fighting*" and related NFPA standards.

On February 9, 2000 the NFPA petitioned FAA to adopt the NFPA aircraft rescue and fire fighting consensus standards and related documents for inclusion in 14 CFR Part 139, Certification and Operations: Land Airports Serving Certain Air Carriers. Attached to that letter was a report including a summary of a detailed survey that the NFPA conducted on ARFF readiness of FAA certificated airports including cost estimates. This survey

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establishes that a significant number of FAA certificated airports already meet the more stringent NFPA consensus standards for ARFF. The adoption of the NFPA aircraft rescue and fire fighting consensus standards and related documents will improve airport safety and would be consistent with the public policy directives of OMB Circular A-119 and the *National Technology Transfer and Advancement Act* (NTTAA).

Additionally, the NFPA has the following specific comments addressing items under consideration in the proposed rule:

- The FAA has requested additional information on the certification of heliports. NFPA recommends the adoption of NFPA 418, Standard for Heliports. NFPA notes that using NFPA 418 in conjunction with FAA A/C 150/5390-2A Heliport Design Advisory Circular will provide a cost effective and reasonable level of safety at heliports.
- Also, the proposed rule mentions that the FAA proposes to delete the requirement for grounding during aircraft fuel servicing. The 1990 edition of NFPA 407, Standard for Aircraft Fuel Servicing eliminated the requirement for grounding during aircraft fuel servicing 10 years ago. Although the FAA issued two informal notices known as "CERTALERTS" on this topic, it is noted that the "CERTALERTS" are advisory in nature and were issued subsequent to and due to the issuance of the 1990 edition of NFPA 407. Adoption of NFPA consensus standards through periodic rulemaking would eliminate the 10-year delay in the change to this section currently under consideration; and therefore provide state-of-the-art safety for the traveling public.

In summary, the NFPA recommends that the FAA adopt NFPA's Aircraft Rescue and Fire Fighting (ARFF) consensus standards and related documents for inclusion in 14 CFR Part 139, Certification and Operations: Land Airports Serving Certain Air Carriers.

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Thank you for the opportunity to comment on Docket Number FAA-2000-7479; Notice Number 00-05.

Sincerely,

A handwritten signature in black ink, appearing to read "ARO'Neill". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Anthony R. O'Neill  
Vice President  
Government Affairs

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